

EXHIBIT 2

Restore Robotics LLC v Intuitive Surgical

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF FLORIDA
3 PANAMA CITY DIVISION
4

5 RESTORE ROBOTICS LLC and
6 RESTORE ROBOTICS REPAIRS
7 LLC,

CIVIL ACTION FILE

Plaintiffs,

NO. 5:19-cv-55-TKW-MJF

vs.

INTUITIVE SURGICAL, INC.,

Defendant.

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11                   REMOTE VIDEO DEPOSITION OF  
12                   MYRIAM CURET McADAMS, M.D.  
13  
14  
15  
16

May 7, 2021

8:49 a.m.

18                   1201 Finn Lane  
19                   Los Altos, California  
20  
21  
22  
23

S. Julie Friedman, CCR-B-1476

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1 regulatory group medical safety officers. I also  
2 work with engineers on product and procedure  
3 development, and I work with the other executives on  
4 strategic alignment for the company.

5 Q. Are you also a trained surgeon?

6 A. I am.

7 Q. And do you have experience in laparoscopic  
8 surgery?

9 A. I do.

10 Q. Do you have experience in robotic surgery?

11 A. Yes. I do.

12 Q. At some point, have you been a teaching  
13 position?

14 A. I have.

15 Q. Have you taught laparoscopic surgery?

16 A. I have.

17 Q. Have you taught robotic surgery?

18 A. I have.

19 Q. Do you recall -- recall --

20 THE VIDEOGRAPHER: I believe we might have  
21 lost our court reporter. Actually, no. She was  
22 frozen for a second. I apologize.

23 THE CONCIERGE TECH: Julie, can you hear  
24 us?

25 THE COURT REPORTER: Oh, god. Oh, god.

1 Oh.

2 THE CONCIERGE TECH: We can hear you,  
3 Julie. Can you hear us?

4 THE VIDEOGRAPHER: The time is now 8:55  
5 a.m. We're going off the record.

6 (Recess from 12:06 p.m. to 12:09 p.m.)

7 THE VIDEOGRAPHER: The time is now 9:09  
8 a.m. We're back on the record.

9 Please continue.

10 Q. (By Mr. Berhold) Well, welcome back,  
11 Dr. Curet.

12 Do you recall giving an interview at  
13 Device Talks in Minnesota in a program produced by  
14 MassDevice?

15 A. Yes.

16 Q. Do you recall making the statement -- I've  
17 seen two revolutions in my surgical lifetime, the  
18 laparoscopic revolution and now the robotic  
19 revolution?

20 A. Yes.

21 Q. Do you still agree with that statement?

22 A. Yes. That's specifically with regards to  
23 my surgical specialty. There's, obviously, other  
24 revolutions that have occurred in other parts of  
25 medicine; but this was specific to my experience.

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1 Q. And what is your surgical specialty?

2 A. General surgery.

3 Q. So you were speaking of a robotic  
4 revolution in abdominal surgery specifically?

5 A. Abdominal and pelvis.

6 Q. You also said in our discussion with  
7 surgeons over and over and over, surgeons who use the  
8 robotic system will not randomize their patients to a  
9 laparoscopic or open approach. They think it's an  
10 inferior approach.

11 Do you personally agree that laparoscopic  
12 or open approach is an inferior approach for some  
13 procedures?

14 A. For some procedures, yes.

15 Q. Well, which ones?

16 A. Well, there's no way I can possibly give  
17 you a -- a list of every procedure. There's too many  
18 procedures out there that -- for me to be able to do  
19 that, answer that question.

20 Q. Is it fair to say that  
21 robotically-assisted surgical devices provide  
22 superior access?

23 MS. LENT: Object to the form.

24 THE WITNESS: I don't know what you mean  
25 by that.